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14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 TIARE RAMIREZ, an individual;
18 Plaintiff,
19 vs.
20 WYNN LAS VEGAS, LLC; DOES I
21 through X; and ROE Corporations XI
22 through XX inclusive,
23 Defendant.

24 Case No. 2:19-cv-01174-APG-BNW

25 **STIPULATION AND ORDER TO**
26 **EXTEND JOINT PRETRIAL ORDER**
27 **DEADLINE**
28 **(Fourth Request)**

STIPULATION AND ORDER TO EXTEND JOINT PRETRIAL ORDER DEADLINE

1 The parties by and through their respective attorneys of record, hereby stipulate
2 to a sixty (60) day extension up to and including March 12, 2023, to file the Joint Pretrial
3 Order. Per LR IA 6-1, Defendant filed the first Stipulation and Order to extend the Joint
4 Pretrial Order Deadline on September 7, 2022 (ECF No. 78), Plaintiff filed the second
5 Stipulation and Order to extend the Joint Pretrial Order Deadline on October 27, 2022
6 (ECF No. 80), and Plaintiff filed the third Stipulation and Order to extend the Joint
7 Pretrial Order Deadline on November 21, 2022 (ECF No. 82). To date, the parties are
8 working and conferring together to complete the Joint Pretrial Order to completion and
9 finalization. This is the fourth request for extension to file Joint Pretrial Order. The
10 deadline for the Joint Pretrial Order is currently January 11, 2023. Plaintiff has
11 requested this extension and Defendant has agreed to the request.

12 Good cause exists for such extension. Defendant has tendered draft of JPTO to

1 Plaintiff. Plaintiff and Defendant are meeting and conferring to complete such JPTO
2 requirements in order to submit a finalized JPTO. Plaintiff's counsel has prior scheduled
3 travel commitments, needs to tend to personal family matters including matters relating
4 to his father's medical prognosis, his ongoing legal matters, the upcoming holidays, and
5 requires the extension to conduct due diligence and potentially streamline various
6 issues. Additionally, Plaintiff's counsel's prior travel commitments have had to be
7 rescheduled and extended due to weather events across the country which has further
8 impacted Plaintiff's counsel's calendar and commitments.

9 Accordingly, the parties stipulate to extending the deadline to file the Joint Pretrial
10 Order deadline to March 12, 2023.

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1 This request is not sought for any improper purpose or other reason of delay. No
2 party is prejudiced by the requested extension.

3 **IT IS SO STIPULATED.**

4 Dated: December 22, 2022

5 Dated: December 22, 2022

6 Respectfully submitted,

6 Respectfully submitted,

7 */s/ Christian Gabroy*

7 */s/ Wendy M. Krincek*

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15 *Atorneys for Plaintiff*
16 *Tiara Ramirez*

15 *Atorneys for Defendant*
16 *Wynn Las Vegas, LLC*

17 **IT IS SO ORDERED.**

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19 UNITED STATES MAGISTRATE JUDGE

20 Dated: December 27, 2022